

Exhibit A

David Carickhoff

From: Jeremy Fancher <jfancher@hechtsolberg.com>
Sent: Thursday, April 3, 2025 3:33 PM
To: David Carickhoff
Cc: Alan Root
Subject: Re: Camston Wrather - Qs from Landlord

CAUTION EXTERNAL EMAIL

Hi David,

I sent you the email below on March 31, stating that we were working on getting you an offer. You did not respond to it. Nor did you ever state there was a deadline for offers, just that you were intending to cut power and security on Monday. If we can get an offer together and present it to you early next week, I encourage you to consider it.

Are you paying administrative expenses now?

I also am not clear on your basis under 707(a). You appear to only cite to 707(a)(3) as a reason for dismissal, yet that provision can only be enforced on a motion by the U.S. trustee. You do not allege anything showing a basis under 707(a)(1)-(2). More to the point, the Court's Interim Order (Docket No. 10) states that *the deadline for the Debtors to file their Schedules and SOFAs is hereby extended through and including April 30, 2025*. Therefore, there is no basis under 707(a)(3) as the deadline has not passed.

Additionally, the proposed order differs from the relief requested in the motion. In the motion, the relief requested is to "pay any open chapter 7 administrative expenses," where the proposed order states "the Trustee may pay any open expenses in connection with his efforts to sell the Carlsbad Facility from cash collateral." It appears the proposed order is limited so that it might not include administrative expenses payable to landlord for the Carlsbad Facility. Please clarify if that is your intention.

Finally, why would remaining cash collateral be given to the Collateral Agent for the Term Lenders?

Given your stance, we will be opposing your motion. While you state responses are due at 1PM today, that is not in accordance with Rule 9006(d)(2), providing any written response must be served at least 1 day before the hearing, unless the court allows otherwise.

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